

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

**Federal Trade Commission**

**Plaintiff,**

**v.**

**Innovative Marketing, Inc., *et al.***

**Defendants,**

**AND**

**Maurice D'Souza**

**Relief Defendant.**

**CIVIL NO. RDB 08-CV-3233**

**PLAINTIFF'S MOTION TO MODIFY THE COURT'S ORDER AUTHORIZING  
ALTERNATIVE SERVICE OF PROCESS ON DANIEL SUNDIN  
AND MEMORANDUM IN SUPPORT THEREOF**

Plaintiff, Federal Trade Commission ("the Commission" or "FTC") hereby moves this Court to modify its previous order granting the Commission's motion to authorize alternative service of process on Daniel Sundin and allow the FTC to serve Daniel Sundin by publishing a notice in the Dagens Nyheter instead of the previously-approved Aftonbladet. In support of its motion, the FTC states as follows:

1. On February 23, 2009, the Court granted the FTC's motion to serve Daniel Sundin by alternative means, including service on his attorneys and registered agent, email, and notice by publication in both The Times in the United Kingdom and the Aftonbladet in Sweden. See D.E. 66.
2. On March 9, 2009, counsel for the FTC was informed by an employee of the Aftonbladet that the minimum cost to run the legal notice attached to the FTC's motion for alternative service once a week for three weeks would be approximately \$22,000.
3. On March 10, 2009, Counsel for the FTC was informed that the Dagens Nyheter newspaper covers

Ängelholm Sweden, Sundin's last known address, and it would charge approximately \$3,000 to run the FTC's legal notice for three weeks.

4. The Dagens Nyheter newspaper is equivalent to The Times in the United Kingdom and has a circulation of 900,000 per day with readership in Ängelholm. Placing the legal notice in this newspaper is reasonably calculated to reach Daniel Sundin and would achieve the desired effect of giving notice to Sundin of this action while conserving taxpayers' money.
5. Therefore, the FTC requests this Court modify its previous order to authorize alternative service of process on Daniel Sundin to allow the FTC to place its notice for publication to alternatively serve Daniel Sundin in the Dagens Nyheter newspaper in Sweden.

Dated: March 23, 2009

Respectfully submitted:

DAVID SHONKA  
General Counsel

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**REVISED ORDER ALLOWING ALTERNATIVE  
SERVICE OF PROCESS ON DANIEL SUNDIN**

Upon consideration of the FTC's Motion to use alternative methods of service to perfect service of process on Defendant Daniel Sundin and the FTC's Motion to Modify the Court's Order; and finding good cause exists, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2009, hereby

**ORDERED**, that, pursuant to Federal Rule of Civil Procedure 4(f)(3), the FTC may perfect service of process on Defendant Daniel Sundin in this matter by alternate methods of service.

**IT IS FURTHER ORDERED** the FTC may perfect service of process by sending the complaint and summons to Daniel Sundin by electronic mail, service on his attorneys and registered agent for Innovative Marketing, Inc., and by publication.

Email address: All valid email addresses including, but not limited to: clenos@gmail.com.

Attorney:

Matthew J. Latella and J. Brian Casey  
Baker & McKenzie LLP  
Brookfield Place, Suite 2100  
181 Bay Street, P.O. Box 874  
Toronto, Ontario  
M5J 2T3, Canada

Registered Agent for Innovative Marketing, Inc.

Apex Trust Corporation Limited  
1876 Hutson Street  
Belize City, Belize

Publication

The FTC may perfect service of process by publication of a notice, as set forth in Attachment A to Plaintiff's Memorandum in Support of Its Motion to Authorize Alternative Service of Process on Daniel Sundin (D.E. 64). This notice shall be placed in The Times in London, U.K. and the Dagens Nyheter in Ängelholm, Sweden for a period of once a week for three weeks.

SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2009

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Richard D. Bennett  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2009, I caused a true and correct copy of the foregoing to be served via the Court's electronic filing system upon:

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/s/ Ethan Arenson